

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE

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FRIENDS OF GEORGE'S, INC.

PLAINTIFF,

v.

STEVEN J. MULROY, *in his individual  
and official capacity as District Attorney  
General of Shelby County, Tennessee,*

DEFENDANT

)  
) **Case No. 2:23-cv-02163-TLP-tmp**  
)  
)  
)

) **COMPLAINT FOR VIOLATIONS OF**  
) **THE CIVIL RIGHTS ACT OF 1871, 42**  
) **U.S.C. § 1983**  
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**DECLARATION OF SARA KATHERINE MCKINNEY**

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I respectfully declare the following in lieu of affidavit under 28 U.S.C. § 1746:

1. I am a member of the bar in good standing and counsel of record in this matter for the prevailing Plaintiff, Friends of George's.

2. The "SKM" time entries on the attached statement of fees accurately reflect the number of hours (56.4) I spent on various aspects of this case, each of which were directly related to proving the Adult Entertainment Act (2023 Tenn. Pub. Acts, ch. 2 (codified at Tenn. Code Ann. §§ 7-51-1401, and -1407)) is unconstitutional.

3. The billing rate of \$225 per hour accurately reflects the amount I would normally charge for performing legal work of the same sort.

EXHIBIT C

I affirm under penalty of perjury that the foregoing statements are true and accurate to the best of my knowledge and information.

Executed June 21, 2023 in Memphis, Tennessee.



SARA KATHERINE MCKINNEY

**FRIEND'S OF GEORGE'S TIMESHEET: SKM \$225/hour**

4/5/2023	1.6 Attending status conference with Judge Parker; debriefing JWB after
4/7/2023	3 Meeting w co-counsel and research for trial brief
4/12/2023	1 Working on discovery and reaching out / speaking with potential witnesses / others impacted
4/24/2023	2.5 Attending Ms. Rodley's deposition; debriefing with co-counsel
5/2/2023	1 Working on discovery responses and coordinating with Ms. Rodley to gather documents
5/4/2023	1 Editing the joint-pretrial order; consulting with co-counsel
5/5/2023	5 Drafting discovery responses and putting documents together; consulting with co-counsel
5/13/2023	2 Reading transcripts; meeting w JWB to prepare a rough outline for witness examination
5/14/2023	4 Trial prep; putting together pleading and discovery notebooks; reviewing docs
5/15/2023	2 Researching and reviewing videos identified as exhibits in defendant's pre-trial order
5/16/2023	3 Researching and reviewing videos; cross-referencing videos with statutes
5/18/2023	1 Conferring w JWB re direct examination topics and strategies
5/19/2023	1.5 Reviewing case law and witness outline; consulting w JWB
5/19/2023	3 Meeting with co-counsel and MS. Rodley to discuss her testimony at trial
5/20/2023	5 Reviewing case and statutory law; confer w JWB and other co-counsel re legal issues for trial
5/21/2023	4.5 Reviewing and editing Ms. Rodley's outline for JWB direct exam; phone call w JWB and Ms. Rodley
5/22/2023	9.5 Attending trial and debriefing after first day of trial; prepared for day two
5/23/2023	1.8 Attending trial day two
5/25/2023	2 Drafting proposed findings of fact
5/25/2023	2 Reviewing findings of fact; going over transcripts and stipulations to cite in the findings

56.4